

5

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEN KENYATTA WILSON,

Defendant.

Case:2:21-cr-20283

Judge: Tarnow, Arthur J.

MJ: Grand, David R.

Filed: 04-28-2021 At 02:06 PM

INDI USA V KEN KENYATTA WILSON (LG)

Violations:

18 U.S.C. § 2113(a)

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 922(g)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**18 U.S.C. § 2113(a) – Bank Robbery**

On or about March 23, 2021, in the Eastern District of Michigan, the defendant, Ken Kenyatta Wilson, by intimidation, did take from the person or presence of another, money, namely \$1,000, belonging to and in the care, custody, control, management, and possession of the Chase Bank, located at 4101 E. Ellsworth Road, Ypsilanti, Michigan 48197, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. § 2113(a).

**COUNT TWO**

**18 U.S.C. § 924(c)(1)(A) - Possession of a Firearm  
in Furtherance of a Crime of Violence**

On or about March 23, 2021, in the Eastern District of Michigan, the defendant, Ken Kenyatta Wilson, did knowingly carry and use a firearm—that is, a silver Smith & Wesson model 65-1 revolver, a Glock model 22 .40 semi-automatic handgun, and an Omni model hybrid multi-caliber semi-automatic rifle—during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery as alleged in Count One, in violation of 18 U.S.C. § 924(c)(1)(A).

**COUNT THREE**

**18 U.S.C. § 922(g)(1) – Felon in  
Possession of a Firearm**

On or about March 23, 2021, in the Eastern District of Michigan, the defendant, Ken Kenyatta Wilson, knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm—that is, a Glock model 22 .40 semi-automatic handgun, which had previously traveled in and affected interstate commerce—in violation of 18 U.S.C. § 922(g)(1).

**FORFEITURE ALLEGATIONS**

**18 U.S.C. § 981, 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c)**

The allegations contained in Counts One through Three of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461, and 18 U.S.C. § 924(d) together with 28 U.S.C. § 2461.

Upon conviction of the offense charged in Count One of this Indictment, the defendant shall forfeit to the United States any property which constitutes, or is derived from, proceeds obtained directly or indirectly as a result of such violation, pursuant to 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461. Further, pursuant to 18 U.S.C. § 924 together with 28 U.S.C. § 2461, the defendant shall forfeit to the United States any firearm or ammunition involved in or used in his knowing violation of 18 U.S.C. § 2113(a).

Upon conviction of the offenses charged in Counts Two and Three of this Indictment, the defendant shall forfeit to the United States any firearm or ammunition involved in or used in his knowing violations of his Title 18 offenses, pursuant to 18 U.S.C. § 924(d) together with 28 U.S.C. § 2461.

THIS IS A TRUE BILL

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

SAIMA S. MOHSIN  
Acting United States Attorney

MATTHEW ROTH  
Chief, Major Crimes

s/Jessica V. Currie  
JESSICA V. CURRIE  
Assistant United States Attorneys  
211 West Fort Street, Suite 2001  
Detroit, Michigan 48226  
(313) 226-9531  
Jessica.Currie@usdoj.gov

Dated: April 28, 2021

United States District Court  
Eastern District of Michigan

**Criminal Case Cov**

Case:2:21-cr-20283  
Judge: Tarnow, Arthur J.  
MJ: Grand, David R.  
Filed: 04-28-2021 At 02:06 PM  
INDI USA V KEN KENYATTA WILSON (LG)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to comp

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>JVC</u>

Case Title: USA v. KEN KENYATTA WILSON

County where offense occurred : WASHTENAW ✓

Check One: ☒ Felony ✓ ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 21-mj-30182 ]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 28, 2021

Date

Jessica V. Currie

Jessica V. Currie  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226-3277  
Phone: 810-252-7546  
Fax: 313-226-2372  
E-Mail address: jessica.currie@usdoj.gov  
Attorney Bar #: P74213

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.